

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DENNIS KOESTERER, Individually and on
behalf of all others similarly situated,

Plaintiff,

-v-

WASHINGTON MUTUAL, INC., et al.,

Defendants.

Case No.: 07-cv-9801

Judge Colleen McMahon

ECF CASE

JOEL ABRAMS, Individually and on behalf
of all others similarly situated,

Plaintiff,

-v-

WASHINGTON MUTUAL, INC., et al.,

Defendants.

Case No.: 07-cv-9806

Judge Alvin Hellerstein

ECF CASE

**[PROPOSED] ORDER FOR THE CONSOLIDATION OF
ALL RELATED ACTIONS, APPOINTMENT LEAD
PLAINTIFF AND APPROVAL OF LEAD PLAINTIFF'S
SELECTION OF LEAD COUNSEL**

Upon good cause shown and all of the records and proceedings herein, **IT IS HEREBY
ORDERED THAT:**

Consolidation

1. The above-captioned actions are appropriate for consolidation and are consolidated for all purposes including, but not limited to, discovery, pre-trial proceedings and trial proceedings, pursuant to Rule 42(c) of the Federal Rules of Civil Procedure.

Appointment Of Lead Plaintiff

2. Burton Rosenfield is hereby appointed the Lead Plaintiff in the consolidated action pursuant to Section (3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. 78n-4(a)(3)(B).

Plaintiff's Counsel

Lead Plaintiff's selection of the law firm of Abbey Spanier Rodd & Abrams, LLP, as Lead Counsel in the consolidated action is approved.

SO ORDERED, this ____ day of _____, 2008

Honorable Colleen McMahon
United States District Judge